

LAW OFFICE OF
ZACHARY MARGULIS-OHNUMA

May 13, 2020


Via ECF

Application granted.

SO ORDERED.

Dated: 5/13/2020

Hon P. Kevin Castel
Southern District of New York
500 Pearl Street
New York, NY 10007


P. Kevin Castel
United States District Judge

RE: U.S. v. Donato Polisenno, 20 Cr. 163 (PKC)

Dear Judge Castel:

This office represents Donato Polisenno in the above-captioned matter. [I write to request a modification of Mr. Polisenno's conditions of release to permit him to travel to Philadelphia every Thursday for work.] The government does not object to this request. Pretrial Services has been contacted regarding this request, but I have yet to receive a response.

Mr. Polisenno owns a business that sells fruit baskets and flower arrangements. Each Thursday, he travels by car from his home at approximately 5am to a wholesale market in Philadelphia to purchase the produce he needs for his business. Typically, he is home by 1pm.

Therefore, I respectfully request that Mr. Polisenno's release conditions be modified to permit him to travel to Philadelphia each Thursday for the purpose of obtaining the items he needs for his profession.

Thank you for your attention to this case.

Very truly yours,

Victoria Nicole Medley

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CC: Sarah Mortazavi and Andrew Adams (via ECF)
PTO Angie Ramirez (via email)